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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

GEOFF WINKLER, as court-appointed  
receiver for J&J Consulting Services, Inc.,  
an Alaska corporation; J&J Consulting  
Services, Inc., a Nevada corporation; and J  
and J Purchasing LLC, Florida limited  
liability company,

Plaintiff,

v.

WELLS FARGO BANK, N.A.,

Defendant.

Case No.: 2:23-cv-00703

**JOINT MOTION FOR EXTENSION  
OF TIME TO FILE AMENDED  
DISCOVERY PLAN  
(Second Request)**

Pursuant to Local Rule IA 6-1, the parties hereby stipulate, subject to this Court's approval, to a two-day extension of time to file an amended discovery plan, and state as follows:

1. WHEREAS, on July 28, 2023, the Court ordered that the parties file an amended discovery plan by August 2, 2023 [Docket No. 39]. The Court directed the parties to explain the length of the proposed schedule and address the coordination of the schedule in this action with the schedule in the related class action, *In re J&J Investment Litigation*, No. 2:22-cv-00529-GMN-NJK (D. Nev.);

2. WHEREAS, on August 3, 2023, the Court granted a stipulation extending the time to file this stipulation to August 7, 2023 [Docket No. 41];

3. WHEREAS, the parties have met and conferred several times since August 3, including throughout the weekend, and today, August 7, 2023, and wish to put forward a joint proposal in both the present action and the class action to materially advance the disposition of both cases, *In re J&J Investment Litigation*, No. 2:22-cv-00529-GMN-NJK (D. Nev.);

4. WHEREAS, the parties need a short extension of time to prepare their proposal for submission to the Court;

5. WHEREAS, this is the second stipulation to extend the time to file an amended discovery plan;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, between the Parties by and through their counsel, subject to the Court's approval, that the parties file their amended discovery plan and proposed scheduling on or before August 9, 2023.

~~PROPOSED~~ ORDER

IT IS SO ORDERED.

Dated: August 8, 2023

  
United States Magistrate Judge

1 Dated: August 7, 2023

Respectfully submitted,

2 **SEMENZA KIRCHER RICKARD**

By: /s/ Joseph Went

3 /s/ Jarrod Rickard

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